

monroe

Environmental Protection Agency...

McKim, Krista Chat Files Organization Activity +

6/9 10:01 AM
 Hey Kristal I'm reviewing the permit for DTE Monroe Plt right now (it's a coal-fired power plant). There are a couple of outfalls in the draft permit that are authorized to discharge both stormwater and process wastewater and have concentration-based limits based on 40 CFR 423 ELGs. Do you have time to take a look at the permit and let me know if you suspect there may be a concern about dilution?

McKim, Krista 6/9 10:35 AM
 sure can you add me as a reviewer in sharepoint?

6/9 10:38 AM
 Great! I will do that

June 22, 2021

McKim, Krista 6/22 11:10 AM
 423 is correct. can you explain more about your dilution question? does it have to do with the sampling locations?

6/22 11:15 AM
 Yes, it has to do with the sampling locations, specifically at 001F and 001H

At those two outfalls, there is authorization to discharge both stormwater and process wastewater. The limits based on 423 are all concentration-based

McKim, Krista 6/22 11:24 AM
 i can't find 001H on the diagram for some reason. anyway the monitoring points look good (the ones i can find) because they are supposed to be directly after whatever the process is that they apply to. they are supposed to be located before any mixing with other waste streams. it looks like they did that right. i have to go back and look but usually MI's language is something like "authorization to discharge from 001 through 001A." something like that.

6/22 12:51 PM
 Yes, they use that language in this permit as well. Okay, great. Thanks so much for taking a look! I appreciate it

monroe

Environmental Protection Agency...

MA Ackerman, Mark Chat Files Organization Activity +

Ackerman, Mark 6/21 10:42 AM
 Hi Katy, I didn't get a chance to look at monroe last week due to the new holiday but I plan to look at it today

6/21 10:43 AM
 No worries. I have Rob taking a look at the effluent analytical report and I asked him to flag if he sees any potential issues by Tues

Ackerman, Mark 6/21 10:43 AM
 alright, I'll keep you posted

6/21 10:43 AM
 Sounds good!

June 22, 2021

Ackerman, Mark 6/22 8:25 AM
 Good morning Katie.

When you get a chance can you reach out to the Monroe permit writer and request a copy of the 316(a) demonstration study from 1976?

I didn't see it on Sharepoint

6/22 8:37 AM
 Done and done

Good morning!

6/22 3:44 PM
 Does change in seasonal avg temp of Lake Erie between 1976 and now have anything to do with allowable temp addition? For example, if Lake Erie has warmed overall in the past few decades, 2500 acres of thermal mixing zone may have greater impact on biotic communities? Just a thought, especially given that Lake Erie is prone to HABs

From reading the info that Tarek sent over, it seems that it may be worth it to require an updated demonstration. Just in my common sense, no experience opinion

monroe

Environmental Protection Agen...

Ackerman, Mark Chat Files Organization Activity +

MA Ackerman, Mark 6/22 3:48 PM
They absolutely need to update the 316a demo
typically they are good for 10 years before updating
I'm trying to piece together the history on this facility...looks like it was sent to R5 for review (assigned to david soong) in 2015 but I can't locate any correspondence from epa
not sure what happened, or why MI never reissued the permit

6/22 3:50 PM
Hm. I wonder if Andrea has any of the old files on that hard drive?

MA Ackerman, Mark 6/22 3:50 PM
she does not
I also went through ecms
no dice

6/22 3:50 PM
interesting

MA Ackerman, Mark 6/22 3:51 PM
let me finish going through it and we can figure out if we need to set up a call with MI

6/22 3:51 PM
Okay, that sounds good

June 23, 2021

6/23 9:19 AM
By the way, it seems like Christine is out until the 28th, not sure if you saw her auto reply
I'll send Sean an email to see if he has more background

June 24, 2021

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Environmental Protection Agen...

Ackerman, Mark Chat Files Organization Activity +

6/24 5:29 PM
Hey, just checking in, does 6/29 work for you for the Monroe meeting?

June 25, 2021

MA Ackerman, Mark 6/25 7:07 AM
Yes, I accepted the invitation and will be ready

June 29, 2021

6/29 10:57 AM
Good morning, Mark. Here's the talking points that I was planning on for the meeting with MI later

EGLE Meeting - Topics for Discussion

- History of the permit
 - Time to reissue
 - EPA review conducted in 2015?
- 316(a)
 - Moving away from 316(a) thermal variance?
 - Require 316(a) demonstration study update
- 316(b)
- More in-depth review of Aluminum concentration in effluent.

just a bare-bones outline, but let me know if i'm forgetting anything

MA Ackerman, Mark 6/29 10:58 AM
I would say the following:

6/29 10:59 AM
Summary of review in 2015, 316(a), 316(b), and steam electric elgs, AI review
i'm putting my thoughts together now

6/29 11:05 AM
Rob was saying that there's a 304(a) for AI, but he needs more ambient water quality data to review. I asked Amanda Bosak for that info. I forwarded my exchange with her as an fyi

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Environmental Protection Agency...

Ackerman, Mark Chat Files Organization Activity

Rob was saying that there's a 304(a) for AI, but he needs more ambient water quality data to review. I asked Amanda Bosak for that info. I forwarded my exchange with her as an fyi

Ackerman, Mark 6/29 11:06 AM
did she get back to you with the BG data?

6/29 11:06 AM
No, she said that Tarek was going to ask some more questions about the request today

WRD doesn't plan to follow up with the BG data until after the meeting

I got impatient and tried to find the data myself and could not for the life of me

Ackerman, Mark 6/29 11:09 AM
it might be a limited data set that MI obtained as part of their watershed analyses (if it even exists). hopefully Amanda can provide something and if not, then monitoring in the current permit may be required so it is available with the subsequent reissuance.

6/29 11:10 AM
okay, that makes sense

6/29 2:47 PM
Just had an interesting conversation with Sean. He had some good background info. He mentioned that the intake volume is so high at Monroe that sometimes their intakes suck in all the water from the river and water from Lake Erie gets drawn up into the mouth of the river. He emphasized that they are one of the worst offenders for entrainment

He also mentioned that the facility's location would make it very difficult to install cooling towers. I don't think that this info changes what we're able to do with the permit, but it definitely leads me to believe that one of the only ways the facility could comply with new regs would be to close

July 6, 2021

Ackerman, Mark 7/6 3:57 PM
I have one more comment I want to add Re. the bottom as transport water purge volume

MI has a 10%, and it should be a site-specific BPJ determination

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Environmental Protection Agency...

Ackerman, Mark Chat Files Organization Activity

Ackerman, Mark 7/6 3:57 PM
I have one more comment I want to add Re. the bottom as transport water purge volume

MI has a 10%, and it should be a site-specific BPJ determination

I'll add it tomorrow morning

Feel free to edit anything I've added

7/6 3:58 PM
Sounds good. I'm working on the RTR Memo now

Ackerman, Mark 7/6 3:58 PM
awesome

7/6 4:04 PM
I'll post it tomorrow morning

July 7, 2021

7/7 10:27 AM
Hey, I'm on this optimization training right now

/working on Monroe stuff at the same time

Ackerman, Mark 7/7 10:27 AM
no worries, we can chat later

7/7 10:27 AM
Sounds good

7/7 10:35 AM
Just uploaded the memo to sharepoint. Still working on typing it up, but the bulk of it is there for the most part

7/7 11:33 AM

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Environmental Protection Agenc... KP

MA Ackerman, Mark Chat Files Organization Activity +

Want to chat 15min before the huddle?

MA Ackerman, Mark 7/7 2:37 PM
Hi Katie. I'll take a quick look at the memo and enclosure again tomorrow morning, but as of now I don't have anything else to add.

I revised the enclosure to include the BATW purge comment

and made an addition to the memo (stating that EGLE will make a final BTA determination during the next reissuance).

July 8, 2021

7/8 8:18 AM
Good morning! I'm taking another quick look at everything as well. The addition to the memo looks good, thanks for adding that

MA Ackerman, Mark 7/8 8:19 AM
I made a couple of edits to the enclosure

I'm going to look at the memo one last time now

7/8 8:33 AM
whoops, already finding typos (by me) in the memo

7/8 9:43 AM
Okay, i think everything is looking pretty good

MA Ackerman, Mark 7/8 10:08 AM
Awesome. I don't have anything else to add at this point.

7/8 10:39 AM
Great, I can go ahead and send it off to Andrea if we're ready

MA Ackerman, Mark 7/8 10:40 AM
go for it

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Environmental Protection Agenc... KP

MA Ackerman, Mark Chat Files Organization Activity +

September 27, 2021

MA Ackerman, Mark 9/27 10:18 AM
Good morning Katie.

I didn't forget about Monroe

I will get to it later today or early tomorrow

9/27 11:57 AM
No worries! I'm in no rush

monroe

Environmental Protection Agenc... KP

Schaller, Andrea Chat Files Organization Activity +

August 25, 2021

8/25 1:22 PM
Imk if you need anything else on DTE WOTUS

Schaller, Andrea 8/25 1:54 PM
told MI they need to have attorneys review. I think a narrow read is only for the "old channel" so it was filled not anything new/remaining

what is intresting/odd. the water from dte comingles with monroe wwtp providing dilution for their discharge but heat for the algae

state is saying it is not regulated until it hits lake erie (that is where the limits were calculated to protect)

8/25 1:59 PM
Also, I think Plum Creek Bay is considered WOTUS, but I can't remember what that document i sent you says

And right, the DTE permit anyway says that the outfall is directly to lake erie.

Do you think the discharge needs to be regulated before it hits lake erie?

Schaller, Andrea 8/25 2:06 PM
it is more about about the dilution and limits needed on Monroe for the receiving water and also L Erie